

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>In re:</b>	:	<b>CHAPTER 13</b>
	:	
<b>DAVID G. SZYMANSKI</b>	:	<b>BANKRUPTCY NO. 09-10880(BIF)</b>
	:	
<b>Debtor</b>	:	
	:	
<b>DAVID G. SZYMANSKI and WILLIAM C. MILLER, Chapter 13 Trustee</b>	:	
	:	
<b>Plaintiffs</b>	:	
	:	
<b>v.</b>	:	<b>ADVERSARY NO. 09-00068 (BIF)</b>
	:	
<b>WACHOVIA BANK, N.A. and FLETCHER HARLEE CORPORATION</b>	:	
	:	
<b>Defendants</b>	:	
	:	

**STIPULATION TO EXTEND BRIEFING DEADLINES**

David G. Szymanski (the “Debtor”), by and through his counsel, Maschmeyer Karalis P.C., William C. Miller, Chapter 13 Trustee (the “Trustee”), by and through his counsel, Jack Miller, Esquire<sup>1</sup>, Wachovia Bank, N.A. (the “Bank”), by and through its counsel, Weber Gallagher Simpson Stapleton Fires & Newby, and Fletcher Harlee Corporation (“FHC”), by and through its counsel, FitzPatrick, Lentz & Bubba, P.C. hereby stipulate to a modification of the currently existing briefing deadlines as follows:

1. The Debtor and the Trustee shall have until July 9, 2009 to file their brief in connection with Count I of the Complaint of the Debtor and the Trustee to Compel Turnover of Property of the Estate Pursuant to 11 U.S.C. § 542 and Avoid and Recover Preferential Transfers pursuant to 11 U.S.C. §§ 547 and 550 (the “Complaint Brief”);

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<sup>1</sup> Although the Trustee is not signing the instant Stipulation, Jack Miller, Esquire advised counsel for the Debtor that he consents to the extension of time.

2. The Bank shall have until July 9, 2009 to file its brief in connection with its Motion for Relief from the Automatic Stay (the "Relief Brief") and its Cross Claim (the "Cross Claim") against FHC (the "Cross Claim Brief");

3. The Debtor, the Trustee, and FHC shall have until July 16, 2009 to file their reply brief to the Relief Brief;

4. FHC shall have until July 16, 2009 to file its reply brief to the Cross Claim Brief;

5. The Bank shall have until July 16, 2009 to file its reply brief to the Complaint Brief.

**WEBER GALLAGHER SIMPSON  
STAPLETON FIRES & NEWBY**

By: /s/ Kenneth M. Portner  
Kenneth M. Portner, Esquire  
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Attorneys for Wachovia Bank, N.A.

**MASCHMEYER KARALIS P.C.**

By: /s/ Robert W. Seitzer  
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Attorneys for the Debtor

**FITZPATRICK, LENTZ & BUBBA, P.C.**

By: /s/ Douglas Smillie  
Douglas Smillie, Esquire  
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Attorneys for Fletcher Harlee Corporation

**ORDERED** on this \_\_\_ day of \_\_\_\_\_, 2009

\_\_\_\_\_  
Honorable Bruce I. Fox,  
United States Bankruptcy Judge